

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**In Re: Constance M. Brown ) 06 B 10787  
                                  )  
Debtor(s)                    ) Judge Carol A. Doyle**

**Notice Of Motion/ Certificate Of Service**

Constance M. Brown  
9821 S Tripp Ave  
Oak Lawn, IL 60453

Joseph P Doyle  
105 S Roselle Rd  
Schaumburg, IL 60193

On 11/09/06 at 10:30 A.M. I will appear in:

Courtroom 742  
219 S Dearborn St  
Chicago, IL 60604

USA and present this motion, a copy of which is hereby served upon you. I certify under penalty of perjury that I caused a copy of this notice be mailed to the above listed persons by first class US mail, postage prepaid, on or before 10/20/06.

/s/ O. Anthony Olivadoti  
Anthony Olivadoti  
for Marilyn O Marshall, Trustee

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***Motion to Dismiss for Unreasonable Delay***

COMES NOW Marilyn O Marshall, Standing Trustee, and requests that this case be dismissed pursuant to 11 USC §1307(c), and in support thereof states the following:

1. Debtor(s) filed for chapter 13 on August 31, 2006.
2. Debtor(s) have/has failed to satisfy the requirements of the bankruptcy code and meet their burden to confirm a plan in a reasonable time.
3. Debtor(s) failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, Trustee prays that this case be dismissed, and for any and all other relief this Court deems just and proper.

/s/ O. Anthony Olivadoti  
Anthony Olivadoti  
for Marilyn O Marshall, Trustee

Office of the Chapter 13 Trustee  
224 South Michigan Ave. Suite 800  
Chicago, Illinois 60604 (312)431-1300